

Exhibit 1

FILED
IN COUNTY CLERK'S OFFICE

A.M. MAY - 2 2008 P.M.

PIERCE COUNTY, WASHINGTON
KEVIN STOCK, County Clerk
BY _____ DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

RONALD G. BROWN, as Chapter 7 Trustee
of the Bankruptcy Estate of In Re: Tiffani L.
Lindstedt,

Plaintiff,

vs.

AFFILIATED COMPUTER SERVICES,
INC., a Delaware corporation, ACS HEALTH
CARE, INC., an Oregon corporation, and
MURIEL T. CARR, and JOHN DOE CARR
individually, and the marital community
composed thereof,

Defendants.

NO. 08 2 07804 9

COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, RONALD G. BROWN ("Brown"), and for cause of action against
the Defendants, states and alleges as follows:

INTRODUCTION

1. AFFILIATED COMPUTER SERVICES, INC. ("ACSI"), describes itself as a rapidly
growing company supporting operations reaching more than 100 countries with nearly \$6 billion
in annual revenues. With unparalleled levels of growth and client retention, ACS is 62,000
people strong and growing. Item III of The ACS Mission states, "[w]e will marshal talented,

COMPLAINT FOR DAMAGES -Page 1 of 9

LAW OFFICES OF GREGORY J. MURPHY, P.S.
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COPY

1 committed people and create an environment in which they can grow professionally through
2 their achievements.

3 2. ACSI is the foremost provider of consulting, application delivery, and information
4 technology (IT) and business process outsourcing solutions to the healthcare industry. ACSI's
5 website boasts that it help its clients implement the technologies and best practices that will lead
6 [clients] to clinical transformation and financial improvement.

7 3. ACSI's website also includes its Code of Ethical Business Conduct ("Code") that applies
8 to every ACSI officer, director, and employee. Chapter 3 of the Code says that ACSI is
9 committed to providing a workplace that is respectful to all employees and free from all forms of
10 harassment.
11

12 IDENTIFICATION OF THE PARTIES

13 4. Plaintiff Brown is the Chapter 7 Trustee of the Bankruptcy Estate of In Re: Tiffani L.
14 Lindstedt pending in U.S. Bankruptcy Court, Western District of Washington at Seattle Cause No. 05-
15 19170. Tiffani L. Lindstedt ("Lindstedt"), is a former employee of the ACSI Defendants. Plaintiff
16 Brown is administering the bankruptcy estate of Tiffani L. Lindstedt.
17

18 5. At all times material hereto, Defendant, ACSI was a Delaware corporation, having a
19 principle place of business at 2828 North Haskell, Dallas, Texas 75204, and conducting business
20 throughout the United States, the state of Washington, and in Pierce County, Washington.
21

22 6. At all times material hereto, Defendant, ACS Health Care, Inc. ("ACS Health Care"),
23 was an Oregon corporation, having a principle place of business at 20819 72nd Avenue South, Suite
24 300, Kent, WA 98032, conducting business throughout the United States, the state of Washington, and,
25 in Pierce County, Washington. ACS Healthcare Solutions is a wholly-owned subsidiary of ACSI.
26

1 7. At all times material hereto, Defendant MURIEL T. CARR and "JOHN DOE" CARR,
2 were residents of Pierce County, Washington, and were husband and wife forming a marital
3 community under the laws of the State of Washington. All acts, omissions and conduct of Defendant
4 Muriel T. Carr benefited her individually, and, were done by and on behalf of the marital community
5 composed of MURIEL T. CARR and JOHN DOE CARR.

6 JURISDICTION

7 8. All of the defendants reside in, or, are doing business in Pierce County, Washington,
8 and the Superior Court of Pierce County has jurisdiction in accordance with RCW 4.12.020(3).
9

10 FACTS

11 9. At all times relevant to the actions alleged in this complaint, Ms. Lindstedt was an
12 employee of ACS HEALTH CARE, or of the company acquired by ACS HEALTH CARE, Patient
13 Accounting Services Center, LLC ("PASC").

14 10. Ms. Lindstedt was hired as a Collector by PASC on October 28, 2003 for its Kent
15 Service Center.
16

17 11. ACS HEALTH CARE acquired PASC in January 2004 and ACS HEALTH CARE
18 continued the operation of the Kent Service Center where Ms. Lindstedt was employed.

19 12. Defendant Carr was hired as a Collector by ACS HEALTH CARE prior to Ms.
20 Lindstedt's hire.

21 13. Ms. Lindstedt was subjected to continuous and frequent harassment by Ms. Carr,
22 including conduct such as verbal threats, physical intimidation, and name calling. This pattern of abuse
23 created a hostile and offensive work environment.
24

25 14. All incidents constituting harassment and hostile work environment occurred during Ms.
26

1 Lindstedt's employment with PASC and continued after the sale to ACS HEALTH CARE.

2 15. Ms. Lindstedt consistently and repeatedly reported the threatening behavior to her
3 immediate supervisor, Mr. Norman Keene, Collections Supervisor; Mr. Keen's supervisor, Mr. Merle
4 Williams, Collection Supervisor; and/or to Mr. Michael Allen, an HR Generalist in ACS HEALTH
5 CARE's Human Resources Department.

6 16. Despite Ms. Lindstedt's repeated complaints of harassment, her supervisors failed to
7 take appropriate action to stop the harassment from continuing to occur.

8 17. On several occasions Mr. Keen told Ms. Lindstedt that "his hands were tied"
9 concerning Ms. Carr, as she had previously filed a sexual harassment complaint against him, and he
10 feared that any action by him could be interpreted as retaliation.

11 18. Ms. Carr made untrue and misleading sworn statements about Ms. Lindstedt in a
12 Petition for and Order for Protection that was filed on May 5, 2005; the King County Superior Court
13 relied upon these alleged facts and issued a Temporary Restraining Order (TRO), including, among
14 other things, the requirement that Ms. Lindstedt stay at least fifteen feet away from Ms. Carr while at
15 their place of employment.

16 19. On May 16, 2005, the Kent police delivered the TRO to Mr. Williams at ACS HEALTH
17 CARE, where Mr. Williams accepted service and then delivered the TRO to Ms. Lindstedt.

18 20. Despite being aware that Ms. Carr had applied for and received a TRO against Ms.
19 Lindstedt, her supervisors failed to take any action whatsoever to protect Ms. Lindstedt.

20 21. The next day, Ms. Lindstedt entered a restroom at work in which Ms. Carr was present,
21 not known to Ms. Lindstedt, thereby unintentionally violating the TRO.

22 22. Ms. Carr immediately said to a coworker in the restroom that she was going to cause
23

1 Ms. Lindstedt to be arrested, and she proceeded to call 911 to report that she had obtained a protective
2 order and that Ms. Lindstedt had come within fifteen feet of her in the restroom.

3 23. Later that day, Ms. Carr caused Ms. Lindstedt to be arrested by the Kent Police for
4 violation of the TRO.

5 24. Ms. Carr watched, cheered, and jeered as Ms. Lindstedt was arrested; this behavior
6 continued until Ms. Lindstedt requested that the police remove Ms. Carr from the area.

7 25. Ms. Lindstedt spent the night in jail and had to arrange for her daughters' care while she
8 was forcibly detained.

9
10 26. On June 6, 2005 the court found that Ms. Carr had not shown by a preponderance of the
11 evidence that Ms. Lindstedt had harassed her, and denied Ms. Carr's request that the TRO be made a
12 full Order, and King County Superior Court Judge Middaugh dismissed Ms. Carr's petition.

13 27. On or about June 24, 2005, the criminal charge alleging Ms. Lindstedt had violated the
14 TRO was dismissed with prejudice.

15 28. Ms. Carr was subsequently terminated from ACS HEALTH CARE for reasons
16 unknown to the plaintiff.

17 29. Ms. Lindstedt returned to work at ACS HEALTH CARE on June 7, 2005, but took
18 leave under the Family and Medical Leave Act on June 8, 2005.

19 30. On July 14, 2005, Ms. Lindstedt resigned from her position at ACS HEALTH CARE
20 SOLUTIONS, on the recommendation of her therapist.

21 31. Ms. Lindstedt's damages are continuing.
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23
24

25 **FIRST CAUSE OF ACTION**
26

NEGLIGENT HIRING, TRAINING, SUPERVISION, AND/OR RETENTION

32. Plaintiff realleges and incorporates paragraphs 1 – 31 as if fully set forth herein.

33. Defendant ACS HEALTH CARE had a duty to use reasonable care in hiring, training, supervising, and retaining its employees and agents. Defendant ACS HEALTH CARE was negligent and breached these duties owed to the Plaintiff, and as a proximate result, Plaintiff sustained the injuries complained of herein.

SECOND CAUSE OF ACTION

**RETALIATION FOR ASSERTING RIGHT TO A HARASSMENT-FREE
WORKPLACE**

34. Plaintiff realleges and incorporates paragraphs 1 – 33 as if fully set forth herein.

35. ACS Healthcare, and its predecessor, PASC, has insisted both verbally and in writing, that it's employees report any instances of harassment regardless of the type of harassment. When Ms. Lindstedt participated with other employees in complaining the hostile environment that was being created by Ms. Muriel Carr, instead of being thanked for bringing the matter to the attention of management, was instead rebuked for what ACS Healthcare considered an improper use of the company's procedures for reporting harassment.

In fact, Ms. Lindstedt and her co-employees were told that they were wasting the company's time and resources and they were interfering with the productivity of the Kent Service Center.

36. ACS Healthcare retaliated against Ms. Lindstedt for engaging in this protected activity by permitting Ms. Carr to continue to harass Ms. Lindstedt and intentionally altering her work environment in order to focus on productivity, instead of focusing on ACS's employees.

37. As a direct and proximate result of ACS Healthcare's unlawful retaliation, Ms.

1 Lindstedt has suffered and continues to suffer lost wages and benefits, lost future earnings, emotional
2 distress, humiliation, loss of enjoyment of life, and other damages in amounts to be proved at trial.

3 **THIRD CAUSE OF ACTION**

4 **ABUSE OF CIVIL PROCESS**

5 38. Plaintiff realleges and incorporates paragraphs 1 – 37 as if fully set forth herein.

6 39. Defendant MURIEL CARR's pursuit of a frivolous anti-harassment order against Ms.
7 Lindstedt was motivated by her own ulterior objectives of retaliation and animus towards Ms.
8 Lindstedt. These ulterior objectives were known by management of ACS Healthcare.
9

10 40. As a direct and proximate result of ACS Healthcare's unlawful retaliation, Ms.
11 Lindstedt has suffered and continues to suffer lost wages and benefits, lost future earnings, emotional
12 distress, humiliation, loss of enjoyment of life, and other damages in amounts to be proved at trial.

13 **FOURTH CAUSE OF ACTION**

14 **MALICIOUS CRIMINAL PROSECUTION**

15 41. Plaintiff realleges and incorporates paragraphs 1 – 40 as if fully set forth herein.

16 42. Defendant MURIEL CARR's conduct constitutes malicious criminal prosecution
17

18 **FIFTH CAUSE OF ACTION**

19 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

20 43. Plaintiff realleges and incorporates paragraphs 1 – 42 as if fully set forth herein.

21 44. The conduct of Defendants MURIEL CARR, ACSI, and ACS HEALTHCARE was
22 negligent insofar as each of them failed to take reasonable care to avoid causing plaintiff emotional
23 distress and caused plaintiff emotional distress. Plaintiff's emotional distress was manifested by
24 objective and/or physical symptomology.
25
26

SIXTH CAUSE OF ACTION

CONSTRUCTIVE DISCHARGE

45. Plaintiff realleges and incorporates paragraphs 1 – 44 as if fully set forth herein.

46. Defendant ACS HEALTHCARE engaged in unlawful practices when it permitted the environment at its Kent Service Center to become overtly hostile without taking any action whatsoever.

STATEMENT OF DAMAGES

As a direct and proximate result of the Defendants' conduct, as alleged herein, Plaintiff TIFFANI L. LINDSTEDT, has sustained the following injuries, all in amounts to be proven at trial:

- 47. Personal Injuries;
- 48. Physical and mental pain, suffering and mental anguish;
- 49. Lost wages, income and impaired earning capacity;
- 50. Medical costs and expenses and other out of pocket expenses;
- 51. Loss of enjoyment of life.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff BROWN, in his capacity as Trustee for the Bankruptcy Estate of Tiffani L. Lindstedt, requests a judgment against Defendants, ACSI, ACS HEALTHCARE and MURIEL T. CARR, jointly and severally, as follows:

A. For all damages available under Washington common law and statute, including special damages for her medical bills, out of pocket expenses, lost wages, income and employment benefits suffered by the Plaintiff and to be suffered in the future;

B. Awarding Plaintiff general damages for pain, suffering, and mental anguish in an amount to be established at trial.

1 C. Awarding Plaintiff her statutory fees and costs incurred in this action.

2 D. Awarding Plaintiff any additional and further relief as the Court may deem just,
3 equitable and appropriate.

4 DATED this 2nd day of May, 2008.

5
6 LAW OFFICES OF GREGORY J. MURPHY, P.S.

7 By: Gregory J. Murphy
8 Gregory J. Murphy, WSBA #16184
9 201 St. Helens Avenue
10 Tacoma, WA 98402
11 Telephone: 253-572-3688
12 Facsimile: 253-572-9588
13 Attorney for Plaintiff
14
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Exhibit 2



CORPORATION SERVICE COMPANY

Notice of Service of Process

AP1 / ALL
Transmittal Number: 5765666
Date Processed: 05/07/2008

Primary Contact: Mr. Tas Panos
Affiliated Computer Services, Inc.
2828 North Haskell Ave.
Building 1, Floor 10
Dallas, TX 75204

Entity:	Affiliated Computer Services, Inc. Entity ID Number 2291324
Entity Served:	Affiliated Computer Services, Inc.
Title of Action:	Ronald G. Brown, as Chapter 7 Trustee of the Bankruptcy Estate of In Re: Tiffani L. Lindstedt vs. Affiliated Computer Services, Inc.
Document(s) Type:	Summons/Complaint
Nature of Action:	Labor / Employment
Court:	Pierce Superior Court, Washington
Case Number:	08 2 07804 9
Jurisdiction Served:	Washington
Date Served on CSC:	05/07/2008
Answer or Appearance Due:	20 Days
Originally Served On:	CSC
How Served:	Personal Service
Plaintiff's Attorney:	Gregory J. Murphy 253-572-3688

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
CSC is SAS70 Type II certified for its Litigation Management System.
2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | sop@cscinfo.com

Exhibit 3

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

RONALD G. BROWN, as Chapter 7 Trustee
of the Bankruptcy Estate of In Re: Tiffani L.
Lindstedt,

Plaintiff,

vs.

AFFILIATED COMPUTER SERVICES,
INC., a Delaware corporation, ACS HEALTH
CARE, INC., an Oregon corporation,
PATIENT ACCOUNTING SERVICE
CENTER, LLC, a Washington Limited
Liability Company, and MURIEL T. CARR,
and JOHN DOE CARR individually, and the
marital community composed thereof,

Defendants.

NO. 08-2-07804-9

AMENDED COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, RONALD G. BROWN ("Brown"), and for cause of action
against the Defendants, states and alleges as follows:

INTRODUCTION

1. AFFILIATED COMPUTER SERVICES, INC. ("ACSI"), describes itself as a
rapidly growing company supporting operations reaching more than 100 countries with nearly \$6
billion in annual revenues. With unparalleled levels of growth and client retention, ACS is
62,000 people strong and growing. Item III of the ACS Mission states, "[w]e will marshal

COPY

1 talented, committed people and create an environment in which they can grow professionally
2 through their achievements.

3 2. ACSI is the foremost provider of consulting, application delivery, and information
4 technology (IT) and business process outsourcing solutions to the healthcare industry. ACSI's
5 website boasts that it help its clients implement the technologies and best practices that will lead
6 [clients] to clinical transformation and financial improvement.

7
8 3. ACSI's website also includes its Code of Ethical Business Conduct ("Code") that
9 applies to every ACSI officer, director, and employee. Chapter 3 of the Code says that ACSI is
10 committed to providing a workplace that is respectful to all employees and free from all forms of
11 harassment.

12 IDENTIFICATION OF THE PARTIES

13
14 4. Plaintiff Brown is the Chapter 7 Trustee of the Bankruptcy Estate of In Re:
15 Tiffani L. Lindstedt pending in U.S. Bankruptcy Court, Western District of Washington at
16 Seattle, Cause No. 05-19170. Tiffani L. Lindstedt ("Lindstedt"), is a former employee of one or
17 more of the ACSI Defendants as identified below. Plaintiff Brown is administering the
18 bankruptcy estate of Tiffani L. Lindstedt.

19
20 5. On information and belief, at all times material hereto, Defendant ACSI was a
21 Delaware corporation, having a principle place of business at 2828 North Haskell, Dallas, Texas
22 75204, and conducting business throughout the United States, the state of Washington, and in
23 Pierce County, Washington. ACSI is an employer within the meaning of RCW 49.46 *et seq.*,
24 RCW 49.48 *et seq.*, and RCW 49.52 *et seq.*

25 6. On information and belief, at all times material hereto, Defendant ACS Health
26

1 Care, Inc. ("ACS Health Care"), was an Oregon corporation, having a principle place of business
2 at 20819 72nd Avenue South, Suite 300, Kent, WA 98032, conducting business throughout the
3 United States, the state of Washington, and, in Pierce County, Washington. It further alleged
4 upon information and belief that ACS Healthcare is a wholly-owned subsidiary of ACSI.

5 7. At all times material hereto, Defendant Patient Accounting Service Center LLC
6 ("PASC"), was a Washington Limited Liability Company and upon information and belief, and
7 therefore alleged, having a principle place of business at 20819 72nd Avenue South, Suite 300,
8 Kent, WA 98032, conducting business throughout the United States, the state of Washington,
9 and, in Pierce County, Washington. It further alleged upon information and belief that PASC is
10 a wholly-owned subsidiary of ACSI.
11

12 8. At all times material hereto, Defendant MURIEL T. CARR and "JOHN DOE"
13 CARR, were residents of Pierce County, Washington, and were husband and wife forming a
14 marital community under the laws of the State of Washington. All acts, omissions and conduct
15 of Defendant Muriel T. Carr benefited her individually, and, were done by and on behalf of the
16 marital community composed of MURIEL T. CARR and JOHN DOE CARR.
17

18 JURISDICTION

19 9. All of the defendants reside in, or, are doing business in Pierce County,
20 Washington, and the Superior Court of Pierce County has jurisdiction in accordance with RCW
21 4.12.020(3).
22

23 FACTS

24 10. At all times relevant to the actions alleged in this complaint, Ms. Lindstedt was an
25 employee of ACS HEALTH CARE, or of the company acquired by ACS HEALTH CARE,
26

1 PASC. Alternately, PASC, a wholly-owned subsidiary of ACSI, was Ms. Lindstedt's employer.

2 11. Ms. Lindstedt was hired as a Collector by PASC on October 28, 2003 for its Kent
3 Service Center.

4 12. ACSI and/or ACS HEALTH CARE acquired PASC in January 2004 and one of
5 the ACS companies continued the operation of the Kent Service Center where Ms. Lindstedt was
6 employed.

7 13. Defendant Carr was hired as a Collector by PASC and/or ACS HEALTH CARE
8 prior to Ms. Lindstedt's hire.

10 14. Ms. Lindstedt was subjected to continuous and frequent harassment by Ms. Carr,
11 including conduct such as verbal threats, physical intimidation, and name calling. This pattern of
12 abuse created a hostile and offensive work environment.

13 15. All incidents constituting harassment and hostile work environment occurred
14 during Ms. Lindstedt's employment with PASC and continued after the acquisition by ACSI
15 and/or ACS HEALTH CARE.

16 16. Ms. Lindstedt consistently and repeatedly reported the threatening behavior to her
17 immediate supervisor, Mr. Norman Keene, Collections Supervisor; Mr. Keen's supervisor, Mr.
18 Merle Williams, Collection Supervisor; and/or to Mr. Michael Allen, an HR Generalist in ACSI
19 and/or ACS HEALTH CARE's Human Resources Department.

20 17. Despite Ms. Lindstedt's repeated complaints of harassment, her supervisors failed
21 to take appropriate action to stop the harassment from continuing to occur.

22 18. On several occasions Mr. Keen told Ms. Lindstedt that "his hands were tied"
23 concerning Ms. Carr, as she had previously filed a sexual harassment complaint against him, and
24
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1 he feared that any action by him could be interpreted as retaliation.

2 19. Ms. Carr made untrue and misleading sworn statements about Ms. Lindstedt in a
3 Petition for and Order for Protection that was filed on May 5, 2005; the King County Superior
4 Court relied upon these alleged facts and issued a Temporary Restraining Order (TRO),
5 including, among other things, the requirement that Ms. Lindstedt stay at least fifteen feet away
6 from Ms. Carr while at their place of employment.

7 20. On May 16, 2005, the Kent police arrived at the Kent Service Center to serve the
8 TRO on Ms. Lindstedt. Instead, the Kent police officer was met by Mr. Williams and Mr.
9 Williams accepted service and then delivered the TRO to Ms. Lindstedt. Mr. Williams knew the
10 content of the TRO and the fact that the TRO involved two employees who worked at the Kent
11 Service Center.
12

13 21. Despite being aware that Ms. Carr had applied for and received a TRO against
14 Ms. Lindstedt, management and her supervisors – including Mr. Keene and Mr. Williams –
15 failed to take any action whatsoever to protect Ms. Lindstedt.
16

17 22. The next day, after meeting with Mr. Keene and discussing her concerns about
18 Ms. Carr and this situation, Ms. Lindstedt entered a restroom at the Kent Service Center in which
19 Ms. Carr was present, not known to Ms. Lindstedt, thereby unintentionally violating the TRO.
20 This occurred after Mr. Keene instructed her to return to work and assured her that this situation
21 would be taken care of.
22

23 23. Ms. Carr immediately said to a coworker in the restroom that she was going to
24 cause Ms. Lindstedt to be arrested, and she proceeded to call 911 to report that she had obtained
25 a protective order and that Ms. Lindstedt had come within fifteen feet of her in the restroom.
26

1 24. Later that day, as a result of the report to the Kent police, Ms. Carr caused Ms.
2 Lindstedt to be arrested by the Kent Police for violation of the TRO.

3 25. While at the Kent Service Center, Ms. Carr watched, cheered, and jeered as Ms.
4 Lindstedt was arrested; this behavior continued until Ms. Lindstedt requested that the police
5 remove Ms. Carr from the area.

6 26. Ms. Lindstedt was forced to spend the night in jail and had to arrange for her
7 daughters' care while she was forcibly detained. No member of management provided her any
8 aid or assistance. This situation was not taken care of.

9 27. On June 6, 2005, the court found that Ms. Carr had not shown by a preponderance
10 of the evidence that Ms. Lindstedt had harassed her, and denied Ms. Carr's request that the TRO
11 be made a full Order, and King County Superior Court Judge Middaugh dismissed Ms. Carr's
12 petition.

13 28. On or about June 24, 2005, the criminal charge alleging Ms. Lindstedt had
14 violated the TRO was dismissed with prejudice.

15 29. Sometime after Ms. Lindstedt was arrested, Ms. Carr was terminated from ACSI
16 and/or ACS HEALTH CARE for reasons unknown to Ms. Lindstedt.

17 30. Ms. Lindstedt returned to work at ACSI and/or ACS HEALTH CARE on June 7,
18 2005, but took leave under the Family and Medical Leave Act on June 8, 2005.

19 31. On July 14, 2005, Ms. Lindstedt resigned from her position at ACSI and/or ACS
20 HEALTH CARE SOLUTIONS, on the recommendation of her therapist.

21 32. Ms. Lindstedt's damages are continuing.
22
23
24
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FIRST CAUSE OF ACTION

NEGLIGENT HIRING, TRAINING, SUPERVISION, AND/OR RETENTION

33. Plaintiff realleges and incorporates paragraphs 1 – 32 as if fully set forth herein.

34. Defendants ACSI and/or ACS HEALTH CARE and/or PASC (“employer”) had a duty to use reasonable care in hiring, training, supervising, and retaining its employees and agents. The employer was negligent and breached these duties owed to the Plaintiff, and as a proximate result, Plaintiff sustained the injuries complained of herein.

SECOND CAUSE OF ACTION

RETALIATION FOR ASSERTING RIGHT TO A HARASSMENT-FREE WORKPLACE

35. Plaintiff realleges and incorporates paragraphs 1 – 34 as if fully set forth herein.

36. The employer had insisted both verbally and in writing, that it’s employees report any instances of harassment regardless of the type of harassment. When Ms. Lindstedt participated with other employees in complaining the hostile environment that was being created by Ms. Muriel Carr, instead of being thanked for bringing the matter to the attention of management, was instead rebuked by her employer for an improper use of the company’s procedures for reporting harassment. In fact, Ms. Lindstedt and her co-employees were told that they were wasting the company’s time and resources and they were interfering with the productivity of the Kent Service Center.

37. The employer retaliated against Ms. Lindstedt for engaging in this protected activity by permitting Ms. Carr to continue to harass Ms. Lindstedt and intentionally altering her work environment in order to focus on productivity, instead of focusing on its’ employees.

38. As a direct and proximate result of the employer’s unlawful retaliation, Ms.

1 Lindstedt has suffered and continues to suffer lost wages and benefits, lost future earnings,
2 emotional distress, humiliation, loss of enjoyment of life, and other damages in amounts to be
3 proven at trial.

4 **THIRD CAUSE OF ACTION**

5 **ABUSE OF CIVIL PROCESS**

6 39. Plaintiff realleges and incorporates paragraphs 1 – 38 as if fully set forth herein.

7 40. Defendant MURIEL CARR's pursuit of a frivolous anti-harassment order against
8 Ms. Lindstedt was motivated by her own ulterior objectives of retaliation and animus towards
9 Ms. Lindstedt. These ulterior objectives were known by management of the employer.
10

11 41. As a direct and proximate result of the employer's unlawful retaliation, Ms. Lindstedt
12 has suffered and continues to suffer lost wages and benefits, lost future earnings, emotional
13 distress, humiliation, loss of enjoyment of life, and other damages in amounts to be proved at
14 trial.
15

16 **FOURTH CAUSE OF ACTION**

17 **MALICIOUS CRIMINAL PROSECUTION**

18 42. Plaintiff realleges and incorporates paragraphs 1 – 41 as if fully set forth herein.

19 43. Defendant MURIEL CARR's conduct constitutes malicious criminal prosecution
20

21 **FIFTH CAUSE OF ACTION**

22 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

23 44. Plaintiff realleges and incorporates paragraphs 1 – 43 as if fully set forth herein.

24 45. The conduct of Defendants MURIEL CARR and EMPLOYERS was negligent
25 insofar as each of them failed to take reasonable care to avoid causing plaintiff emotional distress
26

1 and caused plaintiff emotional distress. Plaintiff's emotional distress was manifested by objective
2 and/or physical symptomology.

3 **SIXTH CAUSE OF ACTION**

4 **CONSTRUCTIVE DISCHARGE**

5 46. Plaintiff realleges and incorporates paragraphs 1 – 45 as if fully set forth herein.

6 47. The employer engaged in unlawful practices when it permitted the environment
7 at its Kent Service Center to become overtly hostile without taking any action whatsoever.

8 48. These acts and/or omissions by the employer resulted in damages to Plaintiff in
9 amounts to be proven at trial.

10 **STATEMENT OF DAMAGES**

11 As a direct and proximate result of the Defendants' conduct, as alleged herein, Plaintiff
12 TIFFANI L. LINDSTEDT, has sustained the following injuries, all in amounts to be proven at
13 trial:
14

- 15 49. Personal Injuries;
16 50. Physical and mental pain, suffering and mental anguish;
17 51. Lost wages, income and impaired earning capacity;
18 52. Medical costs and expenses and other out of pocket expenses;
19 53. Loss of enjoyment of life.
20

21 **REQUEST FOR RELIEF**

22 **WHEREFORE**, Plaintiff BROWN, in his capacity as Trustee for the Bankruptcy Estate
23 of Tiffani L. Lindstedt, requests a judgment against Defendants, ACSI, ACS HEALTHCARE,
24 PASC and MURIEL T. CARR, jointly and severally, as follows:
25
26

1 A. For all damages available under Washington common law and statute, including
2 special damages for her medical bills, out of pocket expenses, lost wages, income and
3 employment benefits suffered by the Plaintiff and to be suffered in the future;

4 B. Awarding Plaintiff general damages for pain, suffering, and mental anguish in an
5 amount to be established at trial.

6 C. Awarding Plaintiff her statutory fees and costs incurred in this action.

7 D. Awarding Plaintiff any additional and further relief as the Court may deem just,
8 equitable and appropriate.
9

10 DATED this 29th day of May, 2008.

11
12 LAW OFFICES OF GREGORY J. MURPHY, P.S.

13 By: Gregory J. Murphy
14 Gregory J. Murphy, WSBA #16184
15 PO Box 1298
16 201 St. Helens Avenue
17 Tacoma, WA 98401-1298
18 Telephone: 253-572-3688
19 Facsimile: 253-572-9588
20 Attorney for Plaintiff
21
22
23
24
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Exhibit 4



CORPORATION SERVICE COMPANY*

Notice of Service of Process

DDZ / ALL
Transmittal Number: 5819438
Date Processed: 06/04/2008

Primary Contact: Mr. Tas Panos
Affiliated Computer Services, Inc.
2828 North Haskell Ave.
Building 1, Floor 10
Dallas, TX 75204

Entity: Patient Accounting Service Center LLC
Entity ID Number 2291330

Entity Served: Patient Accounting Service Center, LLC

Title of Action: Ronald G. Brown, as Chapter 7 Trustee of the Bankruptcy Estate of In Re: Tiffani L. Lindstedt vs. Affiliated Computer Services, Inc.

Document(s) Type: Summons and Amended Complaint

Nature of Action: Labor / Employment

Court: Pierce Superior Court, Washington

Case Number: 08-2-07804-9

Jurisdiction Served: Washington

Date Served on CSC: 06/03/2008

Answer or Appearance Due: 20 Days

Originally Served On: CSC

How Served: Personal Service

Plaintiff's Attorney: Gregory J. Murphy
253-572-3688

Matter Name: Ronald G. Brown, as Chapter 7 Trustee of the Bankruptcy Estate of In Re: Tiffani L. Lindstedt vs. Affiliated Computer Services, Inc. (ID-1118381)

The most recent Service of Process Documents received by CSC:

Document Type	Date Served	Contact Name	Delivery Method	Tracking Number	Transmittal ID
- Summons/Complain t	05/07/2008	Mr. Tas Panos	PRINTFARM		5765664
- Summons/Complain t	05/07/2008	Mr. Tas Panos	PRINTFARM		5765666

To review other documents in this matter, please link to CSC's Matter Management Services at www.incspt.com

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

CSC is SAS70 Type II certified for its Litigation Management System.

2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | sop@cscinfo.com

Exhibit 5

FILED
IN COUNTY CLERK'S OFFICE

A.M. MAY - 2 2008 P.M.

PIERCE COUNTY, WASHINGTON
KEVIN STOCK, County Clerk
BY _____ DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

RONALD G. BROWN, as Chapter 7 Trustee
of the Bankruptcy Estate of In Re: Tiffani L.
Lindstedt,

Plaintiff,

vs.

AFFILIATED COMPUTER SERVICES,
INC., a Delaware corporation, ACS HEALTH
CARE, INC., an Oregon corporation, and
MURIEL T. CARR, and JOHN DOE CARR
individually, and the marital community
composed thereof,

Defendants.

NO. 08 2 07804 9

SUMMONS

TO THE DEFENDANTS: A lawsuit has been started against you in the above entitled court
by RONALD G. BROWN, as Chapter 7 Trustee of the Bankruptcy Estate of In Re: Tiffani L.
Lindstedt, Plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is served upon
you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your
defense in writing, and by serving a copy upon the person signing this summons within 20 days after
the service of this summons, excluding the day of service, or a default judgment may be entered against
you without notice. A default judgment is one where Plaintiff is entitled to what he asks for because
you have not responded. If you serve a notice of appearance on the undersigned person, you are
entitled to notice before a default judgment may be entered.

SUMMONS - Page 1 of 2
\\msrver\shared\folder\Lindstedt_Tiffani\ACS\Pleadings\Summons.doc

LAW OFFICES OF GREGORY J. MURPHY, P.S.
201 ST. HELENS AVENUE
TACOMA, WASHINGTON 98402-2519
PHONE 253-372-3688
FAX 253-372-9588
www.murphy-legal.com

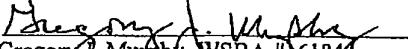
COPY

1 If you wish to seek the advice of an attorney in this matter, you should do so promptly so that
2 your written response, if any, may be served on time.

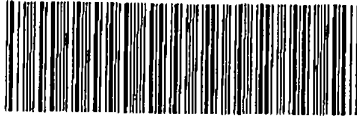
3 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State of
4 Washington.

5 DATED this 2nd day of May, 2008.

6 LAW OFFICES OF GREGORY J. MURPHY, P.S.

7
8 By: 
9 Gregory J. Murphy, WSBA #16184
10 201 St. Helens Avenue
11 Tacoma, WA 98402
12 Telephone: 253-572-3688
13 Facsimile: 253-572-9588
14 Of Attorneys for Plaintiff
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15270 5/12/2008 00158



08-2-07804-9 29729790 AFSR 05-09-08

FILED
IN COUNTY CLERK'S OFFICE

A.M. MAY - 9 2008 P.M.

PIERCE COUNTY WASHINGTON
KEVIN STOCK, County Clerk
BY _____ DEPUTY

/

SUPERIOR COURT, IN AND FOR THE COUNTY OF PIERCE, STATE OF
WASHINGTONRONALD G. BROWN, AS CHAPTER 7 TRUSTEE
OF THE BANKRUPTCY ESTATE OF IN RE:
TIFFANI L. LINDSTEDT,

Plaintiff/Petitioner

Cause #: 08 2 07804 9

vs.
AFFILIATED COMPUTER SERVICES, INC.,
A DELAWARE CORPORATION, ACS HEALTH
CARE, INC., AN OREGON CORPORATION, AND
MURIEL T. CARR; ET VIR

Defendant/Respondent

Declaration of Service of:

SUMMONS AND COMPLAINT FOR DAMAGES, ORDER
SETTING CASE SCHEDULE

Hearing Date:

Declaration:

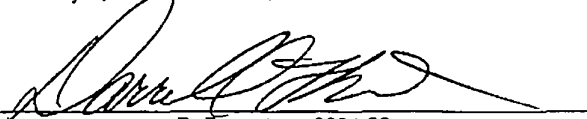
The undersigned hereby declares: That s(he) is now and at all times herein mentioned, a citizen of the United States and a resident of the State of Washington, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

On the date and time of May 7 2008 1:26PM at the address of 6500 HARBOUR HEIGHTS PKWY STE 400 MUKILTEO, within the County of SNOHOMISH, State of WASHINGTON, the declarant duly served the above described documents upon CORPORATION SERVICE COMPANY as Registered Agent for ACS HEALTH CARE, INC., AN OREGON CORPORATION by then and there personally delivering 1 true and correct copy(ies) thereof, by then presenting to and leaving the same with LINDA REED, CORPORATION SERVICE COMPANY REGISTERED AGENT A white female approx. 35-40 years of age 5'8"-5'10" in height weighing 140-160 lbs with brown hair and glasses.

No information was provided that indicates that the subjects served are members of the U.S. military.

I hereby declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated: May 7, 2008 at Everett, WA

by 
D. Bennett 2004-22

Service Fee Total: \$ 32.50

ABC Legal Services, Inc.
206 521-9000
Tracking #: 5286980

ORIGINAL
PROOF OF SERVICE

Murphy, Greg
201 Saint Helens Ave
Tacoma, WA 98402
253 572-3688

15270 5/12/2008 00159

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FILED
IN COUNTY CLERK'S OFFICE

A.M. MAY - 2 2008 P.M.

PIERCE COUNTY, WASHINGTON
KEVIN STOCK, County Clerk
BY _____, DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

RONALD G. BROWN, as Chapter 7 Trustee
of the Bankruptcy Estate of In Re: Tiffani L.
Lindstedt,

Plaintiff,

vs.

AFFILIATED COMPUTER SERVICES,
INC., a Delaware corporation, ACS HEALTH
CARE, INC., an Oregon corporation, and
MURIEL T. CARR, and JOHN DOE CARR
individually, and the marital community
composed thereof,

Defendants.

NO.

08 2 07804 9

SUMMONS

TO THE DEFENDANTS: A lawsuit has been started against you in the above entitled court
by RONALD G. BROWN, as Chapter 7 Trustee of the Bankruptcy Estate of In Re: Tiffani L.
Lindstedt, Plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is served upon
you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your
defense in writing, and by serving a copy upon the person signing this summons within 20 days after
the service of this summons, excluding the day of service, or a default judgment may be entered against
you without notice. A default judgment is one where Plaintiff is entitled to what he asks for because
you have not responded. If you serve a notice of appearance on the undersigned person, you are
entitled to notice before a default judgment may be entered.

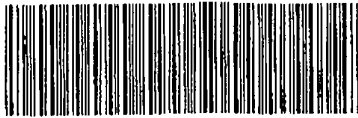
SUMMONS -Page 1 of 2

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LAW OFFICES OF GREGORY J. MURPHY, P.S.
201 ST. HELENS AVENUE
TACOMA, WASHINGTON 98402-2519
PHONE 253-572-3688
FAX 253-572-9588
www.murphy-legal.com

COPY

16139 6/5/2008 08:116



08-2-07804-9 29894616 AFSR 06-05-08

FILED
IN COUNTY CLERK'S OFFICE
A.M. JUN - 4 2008 P.M.
PIERCE COUNTY, WASHINGTON
KEVIN STOCK, County Clerk
BY _____ DEPUTY

**SUPERIOR COURT, IN AND FOR THE COUNTY OF PIERCE, STATE OF
WASHINGTON**

RONALD G. BROWN, AS CHAPTER 7
TRUSTEE OF THE BANKRUPTCY ESTATE
OF IN RE: TIFFANI L. LINDSTEDT,
Plaintiff/Petitioner

Cause #: 08 2 07804 9

VS.
AFFILIATED COMPUTER SERVCIES, INC.,
A DELAWARE CORPORATION, ET AL.,
Defendant/Respondent

Declaration of Service of:

AMENDED SUMMONS AND AMENDED COMPLAINT FOR
DAMAGES,

Hearing Date:

Declaration:


The undersigned hereby declares: That s(he) is now and at all times herein mentioned, a citizen of the United States and a resident of the State of Washington, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

On the date and time of Jun 3 2008 3:10PM at the address of 6500 HARBOUR HEIGHTS PKWY #400 MUKILTEO, within the County of SNOHOMISH, State of WASHINGTON, the declarant duly served the above described documents upon CORPORATION SERVICE COMPANY as Registered Agent for PATIENT ACCOUNTING SERVICE CENTER, LLC, A WASHINGTON LIMITED LIABILITY COMPANY by then and there personally delivering 1 true and correct copy(ies) thereof, by then presenting to and leaving the same with LINDA REED, AGENT CORPORATION SERVICE CO. REGISTERED AGENT.

No information was provided that indicates that the subjects served are members of the U.S. military.

I hereby declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated: June 4, 2008 at Everett, WA

by 
L. Monnie SC9207

Service Fee Total: \$ 66.50

ABC Legal Services, Inc.
206 521-9000
Tracking #: 5287228



**ORIGINAL
PROOF OF SERVICE**

Murphy, Greg
201 Saint Helens Ave
Tacoma, WA 98402
253 572-3688

16199 6/5/2008 08117

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

RONALD G. BROWN, as Chapter 7 Trustee
of the Bankruptcy Estate of In Re: Tiffani L.
Lindstedt,

Plaintiff,

vs.

AFFILIATED COMPUTER SERVICES,
INC., a Delaware corporation, ACS HEALTH
CARE, INC., an Oregon corporation,
PATIENT ACCOUNTING SERVICE
CENTER, LLC, a Washington Limited
Liability Company, and MURIEL T. CARR,
and JOHN DOE CARR individually, and the
marital community composed thereof,

Defendants.

NO. 08-2-07804-9

AMENDED SUMMONS

TO THE DEFENDANTS: A lawsuit has been started against you in the above entitled court
by RONALD G. BROWN, as Chapter 7 Trustee of the Bankruptcy Estate of In Re: Tiffani L.
Lindstedt, Plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is served upon
you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your
defense in writing, and by serving a copy upon the person signing this summons within 20 days after
the service of this summons, excluding the day of service, or a default judgment may be entered against
you without notice. A default judgment is one where Plaintiff is entitled to what he asks for because

SUMMONS -Page 1 of 2
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Summons.doc

LAW OFFICES OF GREGORY J. MURPHY, P.S.
201 ST. HELENS AVENUE
TACOMA, WASHINGTON 98402-2519
PHONE 253-572-3688
FAX 253-572-9588
www.murphy-legal.com

COPY

16199 6/5/2008 00118

1 you have not responded. If you serve a notice of appearance on the undersigned person, you are
2 entitled to notice before a default judgment may be entered.

3 If you wish to seek the advice of an attorney in this matter, you should do so promptly so that
4 your written response, if any, may be served on time.

5 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State of
6 Washington.

7
8 DATED this 29th day of May, 2008.

9 LAW OFFICES OF GREGORY J. MURPHY, P.S.

10 By: Gregory J. Murphy
11 Gregory J. Murphy, WSBA #16184
12 201 St. Helens Avenue
13 Tacoma, WA 98402
14 Telephone: 253-572-3688
15 Facsimile: 253-572-9588
16 Of Attorneys for Plaintiff
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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR PIERCE COUNTY

E-FILED
IN COUNTY CLERK'S OFFICE
PIERCE COUNTY, WASHINGTON

May 02 2008 4:19 PM

No. 08-2-07804-9

KEVIN STOCK
COUNTY CLERK

ORDER SETTING CASE SCHEDULE

Type of case: MSC
Estimated Trial (days): 4
Track Assignment: Standard
Assignment Department: 22
Docket Code: ORSCS

Confirmation of Service	5/30/2008
Confirmation of Joinder of Parties, Claims and Defenses	8/29/2008
Jury Demand	9/5/2008
Settlement Conference Date with Judge/Commissioner MEAGAN M. FOLBY	9/26/2008
Status Conference (Contact Court for Specific Date)	Week of 9/26/2008
Plaintiff's Disclosure of Primary Witnesses	10/24/2008
Defendant's Disclosure of Primary Witnesses	11/21/2008
Disclosure of Rebuttal Witnesses	1/9/2009
Deadline for Filing Motion to Adjust Trial Date	2/6/2009
Discovery Cutoff	3/13/2009
Exchange of Witness and Exhibit Lists and Documentary Exhibits	3/27/2009
Deadline for Hearing Dispositive Pretrial Motions	4/3/2009
Joint Statement of Evidence	4/3/2009
Settlement Conference (To be held)	Week of 4/17/2009
Pretrial Conference (Contact Court for Specific Date)	Week of 4/17/2009
Trial	5/4/2009 9:00

Unless otherwise instructed, ALL Attorneys/Parties shall report to the trial court at 9:00 AM on the date of trial.

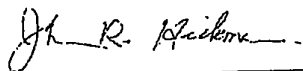
NOTICE TO PLAINTIFF/PETITIONER

If the case has been filed, the plaintiff shall serve a copy of the Case Schedule on the defendant(s) with the summons and complaint/petition: Provided that in those cases where service is by publication the plaintiff shall serve the Case Schedule within five (5) court days of service of the defendant's first response/appearance. If the case has not been filed, but an initial pleading is served, the Case Schedule shall be served within five (5) court days of filing. See PCLR 1.

NOTICE TO ALL PARTIES

All attorneys and parties shall make themselves familiar with the Pierce County Local Rules, particularly those relating to case scheduling. Compliance with the scheduling rules is mandatory and failure to comply shall result in sanctions appropriate to the violation. If a statement of arbitrability is filed, PCLR 1 does not apply while the case is in arbitration.

Dated: May 2, 2008



Judge JOHN R. HICKMAN
Department 22

Exhibit 6

Ben Banta - muriel carr

From: "Doug Cloud" <dcloud@eschelon.com>
To: <bhb@kullmanlaw.com>
Date: 6/6/2008 3:11 PM
Subject: muriel carr

Dear Mr. Banta,

As you know I have limited authority to act on behalf of Ms. Carr. I have been hired mainly to tender the claim to your client. I can not reach her today. However, your question about whether a removal to US district court would be opposed by Ms. Carr will be relayed to her as soon as I can get a hold of her. I will recommend that she consent to the removal when I speak with her. I asked her to tell me when she is served and as of yet I have heard no reports of service.

Sincerely yours,

Douglas R. Cloud
Attorney at Law
253-627-1505

The information contained in this e-mail is confidential and may be attorney-client privileged or attorney work product. It may be considered an offer to compromise litigation under ER 408 and is therefore not admissible in Court. This information is intended for the use of the individual to whom it is addressed. This e-mail may not be forwarded, printed or copied in any manner pursuant to the Electronic Communication Privacy Act, 18 U.S.C. §§ 2510-2521 without written permission of the author. If you are not the intended recipient, or the employee responsible for delivery, you are hereby notified that any use of this communication is strictly prohibited. If you received this e-mail in error, please notify us immediately at 253-627-1505. Thank you.

No virus found in this outgoing message.

Checked by AVG.

Version: 7.5.524 / Virus Database: 270.0.0/1487 - Release Date: 6/6/2008 8:01 AM

05/28/2008 15:28 2536278376

DOUG CLOUD

PAGE 02/02

DOUGLAS R. CLOUD

Attorney at Law

901 South "T" Street, Suite 101
Tacoma, Washington 98405

Phone 253-627-1505
Fax 253-627-8376

May 28, 2008

Mr. Ben Banta, Esq.
THE KULLMAN FIRM
PO Box 60118
New Orleans LA 70160

RE: *Brown v. Muriel T. Carr, et al.*
Pierce County Superior Court Cause No. 08-2-07804-9

Dear Mr. Banta:

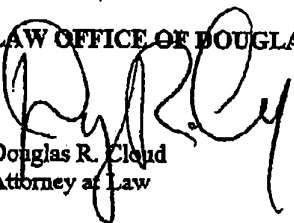
Thank you for faxing me the Complaint that we discussed in our earlier telephone conversation today.

My client, Muriel Carr, does hereby tender the defense of this claim to Affiliated Computer Services, Inc., and/or ACS Health Care, Inc., and/or any insurance company that may provide coverage for this potential loss.

My client has yet to be served on this matter, but I will inform you when she has been served.

Sincerely yours,

LAW OFFICE OF DOUGLAS R. CLOUD


Douglas R. Cloud
Attorney at Law

DRC:clm

Exhibit 7

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR PIERCE COUNTY

RONALD G. BROWN, as Chapter 7 Trustee of
the Bankruptcy Estate of In Re: Tiffani L.
Lindstedt,

Plaintiff,

v.

AFFILIATED COMPUTER SERVICES, INC.,
a Delaware corporation, ACS HEALTH CARE,
INC., an Oregon corporation, and MURIEL T.
CARR and JOHN DOE CARR individually,
and the marital community composed thereof,

Defendants.

NO. 08 2 07804 9

NOTICE OF REMOVAL TO FEDERAL
COURT

TO: CLERK OF THE PIERCE COUNTY SUPERIOR COURT
TO: PLAINTIFF ABOVE NAMED
AND TO: GREGORY J. MURPHY, Attorneys for Plaintiff
AND TO: MICHAEL E. RITCHIE, Attorneys for Defendants Carr

NOTICE IS HEREBY GIVEN, pursuant to 28 U.S.C. § 1452, that on June 6, 2008,
defendant AFFILIATED COMPUTER SERVICES, INC., filed a Notice of Removal of Civil
Action to Federal Court, a copy of which is attached to this Notice, for removal of the above-
entitled action to the United States District Court for the Western District of Washington at
Tacoma, pursuant to 28 U.S.C. 1452.

NOTICE OF REMOVAL TO FEDERAL COURT - 1 of 2
(08 2 07804 9)
[1415060 v1.doc]

LAW OFFICES
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DAHEIM LLP
1201 PACIFIC AVENUE, SUITE 2100
POST OFFICE BOX 1157
TACOMA, WASHINGTON 98401-1157
(253) 620-6500 - FACSIMILE (253) 620-6565

1 This removal terminates this Court's jurisdiction and all proceedings in this forum
2 pursuant to 28 U.S.C. 1446(d).

3 Dated this 6th day of June, 2008.

4 GORDON, THOMAS, HONEYWELL,
5 MALANCA, PETERSON & DAHEIM LLP

6 By Valarie S. Zeeck
7 Valarie S. Zeeck, WSBA No. 24998
8 vzeeck@gth-law.com
9 Attorneys for AFFILIATED COMPUTER
10 SERVICES, INC.

11 CERTIFICATE OF SERVICE

12 I hereby certify that on 6/7, 2008, I caused to be served a copy of the foregoing
13 on the following person(s) in the manner indicated below at the following address(es):

14 Gregory J. Murphy, Esq. (Via facsimile on 06/06/08, followed by U.S. Mail on 6/9/08)
15 201 St. Helens Avenue
16 Tacoma, WA 98402-2519
Fax: (253) 572-9588

17 Michael E. Ritchie (Via facsimile on 06/06/08, followed by U.S. Mail on 6/9/08)
18 1111 Tacoma Avenue South
19 Tacoma, WA 98402
Fax: (253) 572-1435

20 Valarie S. Zeeck
21 Valarie S. Zeeck
22
23
24
25
26

NOTICE OF REMOVAL TO FEDERAL COURT - 2 of 2
(08 2 07804 9)
[1415060 v1.doc]

LAW OFFICES
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DAHEIM LLP
1201 PACIFIC AVENUE, SUITE 2100
POST OFFICE BOX 1157
TACOMA, WASHINGTON 98401-1157
(253) 620-6500 - FACSIMILE (253) 620-6565